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Attorneys for Defendants, Corizon Health, Inc., Joseph McCarthy, MD, Colin Storz, Leslie O'Neil, CJ Buchanan, Louisa Duru, Molly Johnson, and Courtney Nyman

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

RUSSELL PITKIN and MARY PITKIN,
Co-Personal Representatives of the Estate of
MADALINE PITKIN, Deceased,

Plaintiffs,
vs.

CORIZON HEALTH, INC., a Delaware Corporation; **WASHINGTON COUNTY**, a government body in the State of Oregon;
JOSEPH MCCARTHY, MD, an individual; **COLIN STORZ**, an individual; **LESLIE ONEIL**, an individual; **CJ BUCHANAN**, an individual; **LOUISA DURU**, an individual; **MOLLY JOHNSON**, an individual; **COURTNEY NYMAN**, an individual,

Defendants.

Case No. 3:16-cv-02235-AA

DECLARATION OF RICHARD K. HANSEN IN SUPPORT OF INDIVIDUAL DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND CORIZON HEALTH, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT

I, Richard K. Hansen, hereby declare as follows:

1. I am one of the attorneys of record for Defendants Corizon Health, Inc., Joseph McCarthy, MD, Colin Storz, Leslie O'Neil, CJ Buchanan, Louisa Duru, Molly Johnson, and Courtney Nyman in the above-captioned action. I make this declaration in support of Individual Defendants' Motion for Summary Judgment.
2. Exhibit 1 is a true and accurate copy of relevant excerpts from the deposition of Molly Johnson, taken on April 27, 2017.
3. Exhibit 2 is a true and accurate copy of relevant excerpts from the deposition of C.J. Buchanan, taken on August 15, 2017.
4. Exhibit 3 is a true and accurate copy of relevant excerpts from the deposition of Deputy Ken Mitchell, taken on August 14, 2017.
5. Exhibit 4 is a true and accurate copy of relevant excerpts from the deposition of Matthew Northup, taken on April 30, 2018.
6. Exhibit 5 is a true and accurate copy of relevant excerpts from the deposition of Colin Storz, PA, taken on April 26, 2017.
7. Exhibit 6 is a true and accurate copy of relevant excerpts from the deposition of Dr. Joseph McCarthy, taken on June 27, 2017.
8. Exhibit 7 is a true and accurate copy of relevant excerpts from the deposition of Evangeline Nichols, taken on June 12, 2017.
9. Exhibit 8 is a true and accurate copy of relevant excerpts from the deposition of Courtney Nyman, taken on June 12, 2017.
10. Exhibit 9 is a true and accurate copy of relevant excerpts from the deposition of Deputy Richard Thompson, taken on August 16, 2017.
11. Exhibit 10 is a true and accurate copy of relevant excerpts from the deposition of Leslie O'Neil, taken on April 27, 2017.

12. Exhibit 11 is a true and accurate copy of relevant excerpts from the deposition of Nerissa Galvez, taken on June 27, 2017.

13. Exhibit 12 is a true and accurate copy of relevant excerpts from the deposition of Louisa Duru, taken on October 2, 2017.

14. Exhibit 13 is a true and accurate copy of relevant excerpts from the deposition of Tony Wertz, taken on October, 2017.

15. Exhibit 14 is a true and accurate copy of relevant excerpts from the deposition of Mandy Forsmann, taken on January 23, 2018.

16. Exhibit 15 is a true and accurate copy of relevant excerpts of Corizon's medical file of Madaline Pitkin, Bates numbered CORIZON000002; CORIZON000004-10; CORIZON000012-17; CORIZON000019-21; and CORIZON000023.

17. Exhibit 16 is a true and accurate copy of relevant excerpts of Washington's County Sheriff's Office file of Madaline Pitkin, Bates numbered CORIZON000040; and, CORIZON000047.

18. Exhibit 17 is a true and accurate copy of excerpts of the Professional Services Contract between Washington County and Prison Health Services, Inc., Bates numbered CORIZON000367.

19. Exhibit 18 is a true and accurate copy of relevant excerpts of contract between Corizon Health, Inc. and Washington County, dated June 18, 2013, Bates numbered CORIZON000399-402.

20. Exhibit 19 is a true and accurate copy of Prison Health Services Inc.'s staffing pattern, Bates numbered CORIZON000406.

21. Exhibit 20 is a true and accurate copy of letter from Mandy Forsmann to Colin Storz, PA, dated June 27, 2014, Bates numbered CORIZON001203.

22. Exhibit 21 is a true and accurate copy of letter from Nancy James to Colin Storz, PA, dated March 14, 2014, Bates numbered CORIZON001307-1309.

23. Exhibit 22 is a true and accurate copy of PA Colin Storz' Job Description, Bates numbered CORIZON001221-1222.

24. Exhibit 23 is a true and accurate copy of relevant excerpts of Tualatin Police Department's Special Report by Investigator K. Winfield, Bates numbered WC001606-1607; and, WC001819.

25. Exhibit 24 is a true and accurate copy of excerpt of expert report of Steven R. Shelton, MD, CCHP-A, CCHP-P, FACC, dated July 2, 2018.

26. Exhibit 25 is a true and accurate copy of excerpt of expert report of Domenic Sica, M.D.

27. Exhibit 26 is a true and accurate copy of except of expert report of Carl Wigren.

28. Exhibit 27 is a true and accurate copy of excerpt of rebuttal expert report of Carl Wigren, dated August 1, 2018.

29. Exhibit 28 is a true and accurate copy of excerpts of expert report of Nathaniel Moore, M.D., dated July 31, 2018.

30. Exhibit 29 is a true and accurate copy of excerpts of the expert report of Linda Bernard, RN, LNC, CCHP-RN, dated July 2, 2018.

31. Exhibit 30 is a true and accurate copy of excerpts from the Oregon State Medical Examiner's Report, Bates numbered, CORIZON000026-27; and, CORIZON000036.

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.**

Executed on this 3rd day of October, 2018.

/s/Richard K. Hansen
Richard K. Hansen, OSB #832231

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October, 2018, I served the foregoing DECLARATION OF RICHARD K. HANSEN IN SUPPORT OF INDIVIDUAL DEFENDANTS' MOTION FOR SUMMARY JUDGMENT AND CORIZON HEALTH, INC.'S MOTION FOR PARTIAL SUMMARY JUDGMENT on the following parties:

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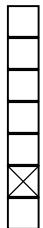
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by:



U.S. Postal Service, ordinary first class mail
U.S. Postal Service, certified or registered mail,
return receipt requested
hand delivery
facsimile
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/s/Richard K. Hansen
Richard K. Hansen